

**SEALED****ORIGINAL**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

NO.

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FILED

JUN 21 2023	
CLERK, U.S. DISTRICT COURT By _____ Deputy	

v.

HOLLY ANN ELKINS

**3 - 23 CR 0247 - B****INDICTMENT**

The Grand Jury charges:

Count One  
 Conspiracy to Stalk  
 [Violation of 18 U.S.C. § 371]

Beginning in or about April 2020, and continuing through on or about October 2, 2020, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant **Holly Ann Elkins** and Andrew Charles Beard did knowingly, intentionally, and unlawfully conspire and agree together, and with each other, to commit a certain offense against the United States, that is, Stalking, in violation of 18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b).

**Object of the Conspiracy**

It was part of the conspiracy that **Elkins** and Beard discussed and planned the use of harassing, intimidating, and coercive tactics against A.A.B. to remove Minor 1—Beard's and A.A.B.'s biological child—from A.A.B.'s custody.

Manner and Means of the Conspiracy

It was part of the conspiracy that **Elkins** and Beard formulated a plan and agreement which, among other things, included:

- a. installing a global positioning system (“GPS”) tracking device on the automobiles of A.A.B. and A.A.B.’s boyfriend, B.E., to monitor A.A.B.’s travels;
- b. falsely reporting criminal behavior by fabricating criminal offenses against A.A.B. and an immediate family member of A.A.B. to have them arrested for offenses that they did not commit; and
- c. assaulting and murdering A.A.B. with a dangerous weapon.

Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy, and to accomplish the object of the conspiracy, the following overt acts, among others, were committed:

- a. In or about October 2019, Beard activated a GPS tracking service to monitor A.A.B.’s travels.
- b. In or about June 2020, **Elkins** and Beard searched for GPS tracking devices and associated accessories to place on A.A.B.’s automobile.
- c. In or about June, July, and August 2020, **Elkins** and Beard purchased GPS tracking devices and associated accessories.
- d. In or about June, July, and August 2020, **Elkins** and Beard took surveillance photographs of A.A.B.’s and B.E.’s automobiles.
- e. On or about June 25, 2020, **Elkins** and Beard placed a GPS tracking device on A.A.B.’s automobile.

f. On or about July 9, 2020, Beard purchased a GPS tracking device that was placed on B.E.'s vehicle.

g. On or about July 25, 2020, **Elkins** telephoned the police using a fake name and falsely reported that she observed A.A.B.'s automobile driving dangerously on a public highway, and **Elkins** provided the police with A.A.B.'s automobile description and license plate number.

h. On or about August 6, 2020, **Elkins** telephoned the police and falsely reported that A.A.B.'s mother, T.C., had assaulted her with A.A.B. present.

i. On or about August 11, 2020, **Elkins** and Beard hired a private investigator to track and monitor A.A.B. and B.E.

j. On or about September 2, 2020, **Elkins** and Beard planted illegal drugs and a pistol, with an obliterated serial number, in the trunk of A.A.B.'s automobile to have A.A.B. arrested.

k. On or about September 2, 2020, **Elkins** texted Beard a photograph of A.A.B.'s automobile's license plate for Beard to provide the license plate number to the police in a false report that A.A.B. was selling drugs from the automobile.

l. On or about September 2, 2020, Beard telephoned the police using a fake name and falsely reported that A.A.B. was selling drugs to Black men at the apartment complex where A.A.B. worked, providing the police with A.A.B.'s automobile description and license plate number as the automobile from which A.A.B. was hiding and selling drugs.

m. On or about September 13, 2020, **Elkins** and Beard purchased a silver

Nissan Quest van to carry out a planned attack on A.A.B.

- n. On or about September 14, 2020, **Elkins** purchased dark-colored makeup for Beard's disguise for the attack on A.A.B.
- o. On or about September 19, 2020, **Elkins** and Beard purchased .410 shotgun shells and a Camillus knife for the attack on A.A.B.
- p. On or about September 23, 2020, Beard purchased a fake beard for his disguise for the attack on A.A.B.
- q. On or about September 26, 2020, Beard abandoned the silver Nissan Quest previously purchased, and instead purchased a black Ford Expedition to carry out the attack on A.A.B.
- r. On or about October 2, 2020, Beard, disguised as a bearded Black man, murdered A.A.B. at the apartment complex where A.A.B. worked by shooting and stabbing A.A.B. to death.
- s. While Beard carried out the murder of A.A.B., **Elkins** remained at Beard's residence with Minor 1 as an alibi.
- t. On or about October 6, 2020, **Elkins** met with law enforcement and attempted to provide an alibi for Beard, falsely claiming that Beard was at the residence with her at the time of A.A.B.'s murder.

In violation of 18 U.S.C. § 371.

Count Two

Stalking Using a Dangerous Weapon and  
Resulting in Serious Bodily Injury, Life Threatening Bodily Injury, and Death  
[Violation of 18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b)]

Beginning in or about April 2020, and continuing through on or about October 2, 2020, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant **Holly Ann Elkins** and Andrew Charles Beard, with the intent to kill, injure, harass, and intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, namely, A.A.B., did use an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, including a computer, the internet, electronic mail, a telephone, and a global positioning system (“GPS”) tracking device, to engage in a course of conduct that (A) placed A.A.B. in reasonable fear of death and serious bodily injury, and (B) caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to A.A.B., and **Elkins** and Beard did further use a dangerous weapon, to wit: a firearm and a sharp object, during the offense, which resulted in serious bodily injury, life threatening bodily injury, and death to A.A.B.

In violation of 18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b); liability under *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Three

Using, Carrying, Brandishing, and Discharging a Firearm  
During and in Relation to a Crime of Violence  
[Violation of 18 U.S.C. § 924(c)(1)(A)(iii)]

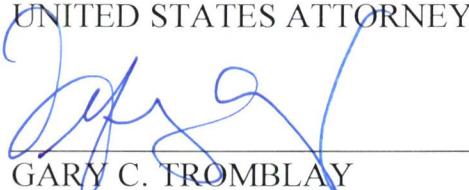
On or about October 2, 2020, in the Dallas Division of the Northern District of Texas, defendant **Holly Ann Elkins** and Andrew Charles Beard did knowingly use, carry, brandish, and discharge a firearm, to wit: a shotgun, during and in relation to a crime of violence, namely, stalking using a dangerous weapon and resulting in serious bodily injury, life threatening bodily injury, and death, in violation of 18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b), as alleged in Count Two of this indictment, for which the defendant may be prosecuted in a court of the United States.

In violation of 18 U.S.C. § 924(c)(1)(A)(iii); liability under *Pinkerton v. United States*, 328 U.S. 640 (1946).

A TRUE BILL:

  
Leigha Simonton  
Foreperson

LEIGHA SIMONTON  
UNITED STATES ATTORNEY

  
Gary C. Tromblay  
Assistant United States Attorney  
Louisiana Bar Roll No. 22665  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214-659-8600  
Facsimile: 214-659-8805  
Email: Gary.Tromblay@usdoj.gov

  
Andrew J. Briggs  
Assistant United States Attorney  
California State Bar No. 294224  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214-659-8600  
Facsimile: 214-659-8805  
Email: Andrew.Briggs@usdoj.gov

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FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

HOLLY ANN ELKINS

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SEALED INDICTMENT

18 U.S.C. § 371

Conspiracy to Stalk  
(Count 1)

18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b)

Stalking Using a Dangerous Weapon and  
Resulting in Serious Bodily Injury, Life Threatening Bodily Injury, and Death  
(Count 2)

18 U.S.C. § 924(c)(1)(A)(iii)

Using, Carrying, Brandishing, and Discharging a Firearm  
During and in Relation to a Crime of Violence  
(Count 3)

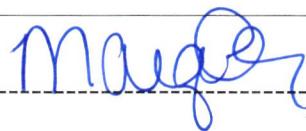
3 Counts

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A true bill rendered

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DALLAS



FOREPERSON

Filed in open court this 21 day of June, 2023.

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**Warrant to be Issued**

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UNITED STATES MAGISTRATE JUDGE  
No Criminal Matter Pending